

## **REMARKS**

### **SUMMARY**

Reconsideration of the application is respectfully requested.

Claims 1-3, 9-12, 14, 15, 18, 20, 23, 26-29, 35, 38-40, 43-46, 50, 53, 56-59, 62, 68, 70, 72, 74, 76-78, 82-86, 88-90, 93, 96 and 99 are in the application. Claims 1-3, 9-12, 14, 15, 18, 20, 23, 26-29, 35, 38, 43, 44, 53, 56-59, 62, 70, 72, 74, 76-78, 84-86, and 88-90 have been rejected. Claims 1, 35, 38, 53, 70, and 90 have been amended. Claims 2 and 39 have been cancelled.

### **ALLOWABLE SUBJECT MATTER**

Applicant thanks the Examiner for finding claims 39, 40, 45, 46, 50, 66, 68, 69, 82-83, 93, 96, and 99 allowable but for their dependence on rejected base claims. In view of the amendments and arguments presented in this Response, Applicant believes that these claims, as well as all other pending claims, are now in condition for allowance.

### **CLAIM OBJECTIONS**

The Examiner objects to claim 35 because of an informality. In response, claim 35 has been amended.

### **CLAIM REJECTIONS UNDER 35 U.S.C. § 112**

In "Claim Rejections – 35 USC § 112," item 4 on page 2 of the above-identified Office Action, claims 1-3, 9-12, 14, 15, 18, 20, 23, 26-29, 35, 70, and 72 have been rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Applicant respectfully traverses.

Claim 1, and accordingly dependent claims 2-3, 9-12, 14, 15, 18, 20, and 23, were rejected as vague and indefinite because claim 1 contains the language "controlling operation of said controllee electronic apparatus, by said controllee electronic apparatus." The

Examiner asserts that this language merely shows the same device controlling itself. Applicant, however, respectfully notes that the Examiner has not completely cited the limitation regarded as vague. Completely cited, the recitation of claim 1 states: “controlling operation of said controllee electronic apparatus, by said controllee electronic apparatus in accordance with said received first control commands.” Thus, claim 1 does not merely recite a device controlling itself, but rather, a device controlling itself in accordance with control commands received from an exterior remote control. Accordingly, Applicant respectfully submits that claim 1, and dependent claims 2-3, 9-12, 14, 15, 18, 20, and 23, are not vague and indefinite, and are thus allowable under §112, second paragraph.

Claim 26, and accordingly dependent claims 27-29 and 35, were rejected as vague and indefinite because claim 26 contains the language “controlling operation of said auxiliary controllee electronic device, by said auxiliary controllee electronic device.” The Examiner asserts that this language merely shows the same device controlling itself. Applicant, however, respectfully notes that the Examiner has not completely cited the limitation regarded as vague. Completely cited, the recitation of claim 26 states: “controlling operation of said auxiliary controllee electronic device, by said auxiliary controllee electronic device, in accordance with said received control commands.” Thus, claim 26 does not merely recite a device controlling itself, but rather, a device controlling itself in accordance with control commands received from an exterior remote control. Accordingly, Applicant respectfully submits that claim 26, and dependent claims 27-29 and 35, are not vague and indefinite, and are thus allowable under §112, second paragraph.

Claim 70, and accordingly dependent claim 72, has been rejected as lacking antecedent basis. In response, Applicant has amended claim 70 to provide the proper antecedent basis.

#### **CLAIM REJECTIONS UNDER 35 U.S.C. § 102**

In “Claim Rejections – 35 USC § 102,” item 6 on page 3 of the above-identified Office Action, claims 1-3, 9-12, 14, 38, 43, 44, 53, 56-59, 62, 74, 76-78, 84-86, and 88-90

have been rejected as being fully anticipated by U.S. Patent No. 6,603,488 to *Humpleman et al.* (hereinafter “Humpleman”) under 35 U.S.C. § 102(e). Applicant respectfully traverses.

Claims 1, 3, 9-12, 14, 38, 43, 44, 53, 56-59, 62, 74, 76-77, and 90

Claim 39 was found to be allowable except for its dependence on a rejected base claim. In response, Applicant has amended independent claim 38 to include the limitations of claim 39. Accordingly, Applicant believes amended claim 38, and dependent claims 40, 43-46, and 50, to be in condition for allowance.

Claim 1 recites similar limitations to claim 38, and accordingly has also been amended to contain the language of claim 39. As amended, claim 1 recites a “method comprising:

sending to a remote control, by a controllee electronic apparatus, a first collection of user interface displays having associated control commands, for the remote control to control the controllee electronic apparatus, the first collection of user interface displays having a plurality of display states and associated display state transition rules;

receiving by the controllee electronic apparatus, first control commands, from said remote control, the first control commands being resulted from said first collection of user interface displays being used by a user of said remote control; and  
controlling operation of said controllee electronic apparatus, by said controllee electronic apparatus in accordance with said received first control commands.”

At least because they contain similar recitations to amended claim 38, amended claim 1, and dependent claims 3, 9-12, and 14, are believed to be allowable over the cited art.

Additionally, amended claim 1 is further believed to be allowable because Humpleman fails to teach “sending to a remote control, by a controllee electronic apparatus, a first collection of user interface displays having associated control commands, for the remote control to control the controllee electronic apparatus, the first collection of user

interface displays having a plurality of display states and associated display state transition rules.” Humpleman merely teaches the sending from a home network device to a remote control one or more HTML files defining a GUI for that home electronic device, and the remote control rendering the GUI on a display of the remote. The one or more HTML files of Humpleman do not, however, expressly or inherently disclose a “first collection of user interface displays having a plurality of display states and associated display state transition rules.” Nowhere in Humpleman does one find an HTML file having a plurality of display states and associated display state transition rules. Nor do HTML files inherently include such states and rules. Accordingly, Humpleman fails to anticipate amended claim 1.

Claims 38, 53, and 90 have all been amended to include the limitations of claim 39. Thus, amended claims 38, 53, and 90 all include limitations similar to those of amended claim 1. Accordingly, for at least the above reasons, Humpleman fails to anticipate amended claims 38, 53, and 90.

Claims 3, 9-12, 14, 42, 44, 53, 56-59, 62, 74, and 76-77 depended from claims 1, 38, and 53, correspondingly including their limitations. Accordingly, for at least the above reasons, Humpleman fails to anticipate claims 3, 9-12, 14, 42, 44, 53, 56-59, 62, 74, and 76-77.

#### Claims 78, 84-86 and 88-89

Claims 26 was not rejected by the Examiner as being anticipated by Humpleman. Claims 78 merely recites an apparatus of claim 26. Accordingly, for at least the reasons that claim 26 is not anticipated by Humpleman, claim 78 and dependent claims 84-86 and 88-89 are also patentable over the cited art.

Further, claims 78, 84-86, and 88-89 are patentable over Humpleman because Humpleman fails to disclose the recitations of claim 78. Claim 78 recites “an auxiliary controllee electronic apparatus comprising:

first means adapted to send from the auxiliary controllee electronic apparatus specifications for a collection of user interface displays having associated control commands for controlling the auxiliary controllee electronic device to a primary controllee electronic device, for the primary controllee electronic device to generate and send the collection of user interface displays to a remote control;

second means adapted to receive control commands originated from said remote control into the auxiliary controllee electronic apparatus, the control commands being resulted from said received collection of user interface displays being used by a user of said remote control; and

third means adapted to control operation of said auxiliary controllee electronic device in accordance with said received control commands.”

In contrast, Humpleman merely teaches the transmission of HTML files defining a control interface for a home network device to another home network device or directly to a remote control, for display on either the other device or the remote control. Nowhere does Humpleman disclose, expressly or inherently, the transmission of “specifications for a collection of user interface displays” from an auxiliary controllee electronic apparatus to a primary controllee electronic device, “for the primary controllee electronic device to generate and send the collection of user interface displays to a remote control.” First, Humpleman only teaches HTML files. Such files can not read on both “specifications for a collection of user interface displays” and “a collection of user interface displays.” Accordingly, Humpleman fails to disclose at least one of those key recitations. Second, Humpleman only teaches a home network device that sends HTML files to another device or directly to a remote control. Nowhere does Humpleman teach the sending of HTML files from one device to another, and then on to a remote control. Accordingly, Humpleman fails to anticipate claim 78.

Claims 84-86 and 88-89 depend from claim 78, incorporating its limitations. Accordingly, for at least the same reasons, claims 84-86 and 88-89 are patentable over Humpleman.

**CONCLUSION**


In view of the foregoing, reconsideration and allowance of claims 1-3, 9-12, 14, 15, 18, 20, 23, 26-29, 35, 38-40, 43-46, 50, 53, 56-59, 62, 66, 68-70, 72, 74, 76-78, 82-86, 88-90, 93, 96 and 99 are solicited. Accordingly, a Notice of Allowance is respectfully requested.

If the Examiner has any questions concerning the present paper, the Examiner is kindly requested to contact the undersigned at (206) 407-1513. If any fees are due in connection with filing this paper, the Commissioner is authorized to charge the Deposit Account of Schwabe, Williamson and Wyatt, P.C., No. 50-0393.

Respectfully submitted,  
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